

CMH 999990-0030

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SAMUEL MAGGIO,)	
)	
Plaintiff,)	
)	
v.)	No. 06 C 2893
)	
KONICA-MINOLTA BUSINESS,)	Judge Kennelly
SOLUTIONS USA ("KMBS"))	Magistrate Judge Soat Brown
)	
Defendant.)	

**STIPULATION OF DISMISSAL
PURSUANT TO FRCP 41(a)(1)(A)(ii)**

NOW COMES Plaintiff, SAMUEL MAGGIO, by and through his attorneys, ANDERSON, RASOR & PARTNERS, LLP, and respectfully requests the voluntarily dismissal of this action pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. In light of said dismissal, Plaintiff and Defendant (collectively "the Parties") request that the Court strike the scheduled pre-trial conference and trial date (November 13 and 17, 2008, respectively) before Judge Kennelly. The Parties further state:

1. By agreement of all parties who have appeared in this action, and given that the above case and its related claims have been fully and completely resolved as reflected in a Confidential Agreement and General Release (the "Release") by and between Plaintiff and Defendant, which will not be filed with the Court, the undersigned, as counsel for Plaintiff and Defendant (the Parties) hereby stipulate and agree that this action should be dismissed with prejudice in its entirety, with all payment and/or award of costs and fees having been disposed of pursuant to the Release.

2. The Parties request that the Court retain jurisdiction for the limited purpose of ensuring the Parties mutual compliance with the terms of the Confidential Agreement and General Release, if necessary.

Respectfully submitted,

ANDERSON, RASOR & PARTNERS, LLP

JACKSON LEWIS, LLP

s/ C. Murray Harris

s/ Cathryn E. Albrecht

C. Murray Harris
Attorney for **Plaintiff SAMUEL MAGGIO**

Cathryn E. Albrecht
Attorney for **Defendant KMBS**

Date: October 20, 2008

Filing Prepared by:

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